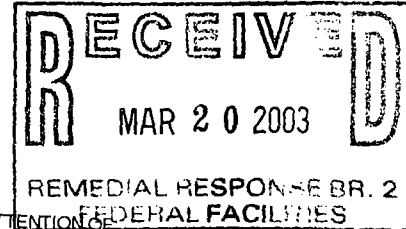




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590



REPLY TO THE ATTENTION OF

C-14J

March 18, 2003

**CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Mr. Paul Karch  
Vice President, Law & Public Affairs  
Appleton Papers Inc.  
825 East Wisconsin Avenue  
Appleton, Wisconsin 54911

Re: Request for Information Pursuant to Section 104(e) of CERCLA for the  
Allied Paper/Portage Creek/Kalamazoo River Superfund Site in  
Kalamazoo and Allegan Counties, Michigan

Dear Mr. Karch:

The U.S. Environmental Protection Agency ("U.S. EPA" or the "Agency") has been supplementing the investigation conducted by the Michigan Department of Environmental Quality at the Allied Paper/Portage Creek/Kalamazoo River Superfund Site (the "Site"), which is located in Allegan and Kalamazoo Counties, Michigan. U.S. EPA believes that Appleton Papers, Inc. ("Appleton Papers") may have information that is relevant to this investigation.

The Comprehensive Environmental Response, Compensation and Liability Act, 42 U.S.C. §§ 9601 *et seq.* ("CERCLA") gives U.S. EPA the authority to: (1) assess contaminated sites; (2) determine the threats to human health and the environment; and (3) clean up contaminated sites. Under Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), U.S. EPA has the authority to gather information and to require persons to furnish information or documents relating to:

- A. The identification, nature and quantity of materials which have been or are generated, treated, stored or disposed of at a vessel or facility or transported to a vessel or facility;
- B. The nature or extent of a release or a threatened release of a hazardous substance or pollutant or contaminant at/or from a vessel or facility; and
- C. The ability of responsible parties to pay for the costs of the clean up.

One area of investigation concerns the amount and sources of PCBs released to the Kalamazoo River. PCBs were used in the manufacture of "no-carbon required" or "NCR" paper during the period 1954 to 1971. PCBs were introduced directly into the secondary fiber recycle stream through the recycling of broke produced in the manufacture of NCR paper, and through the recycling of converter trim from processors of NCR paper. PCBs were introduced indirectly into the secondary fiber recycle stream through the recycling of post-consumer waste paper containing NCR paper.

U.S. EPA understands that, between 1954 and 1971, Appleton Papers produced NCR paper coated with emulsions containing PCBs at its paper mill located in Appleton, Wisconsin. The Agency further understands that, between 1968 and 1971, Appleton Papers produced NCR paper coated with emulsions containing PCBs at its paper mill located in Combined Locks, Wisconsin. (The two Wisconsin mills are referred to herein as the "Appleton mills.") The Agency is attempting to determine to what extent Appleton Papers may have sold, either directly or indirectly through waste paper brokers, NCR paper broke generated at the Appleton mills to any of the secondary fiber pulp and paper mills located within the Kalamazoo River area of Michigan. Attachment A contains a list of known paper mills in the Kalamazoo River area, but it may be that Appleton Papers is aware of other mills in that area that purchased or obtained NCR paper broke from the company.

For purposes of this request, U.S. EPA defines "NCR paper broke" to include side trim from rolls of NCR paper, roll ends, machine brakes, off-specification NCR paper scrapped at the mill and customer returns not resold as a commercial grade of NCR paper. Unless otherwise specified, the relevant time period includes those years when Appleton Papers produced NCR paper coated with any emulsion containing PCBs at, respectively, its Appleton and Combined Locks mills.

U.S. EPA requires that Appleton Papers provide the following information and data as soon as possible, but not later than sixty (60) days from the date of receipt of this Information Request.

1. Provide the month and year when NCR paper coated with any emulsion containing PCBs was first produced at each Appleton mill; the month and year when NCR paper coated with any emulsion containing PCBs was last produced at each Appleton mill; the amount of finished NCR paper shipped from each Appleton mill annually; and the amount of broke generated by each Appleton mill annually.
2. Identify each shipment of NCR paper broke from the Appleton mills that was sent, directly or indirectly through a waste paper broker, to any of the secondary fiber pulp and paper mills located within the Kalamazoo River area of Michigan. For each such shipment, identify: (1) the Appleton mill from which the shipment was made; (2) the date (month and year) of the shipment; (3) the amount (in pounds) of NCR paper broke shipped; and (4) the name and address of the entity to which the shipment was sent.
3. Provide the dates (month and year) and amounts in pounds of NCR paper broke shipped from each of the Appleton mills, either directly or indirectly, to company-owned waste paper brokers and to other waste paper brokers.

4. To the extent available, provide the current names, addresses and phone numbers for each waste paper broker to which NCR paper broke was shipped from the Appleton mills during the relevant period.

Pursuant to the authority of Section 104(e) of CERCLA you are requested to respond to this Information Request. This Request is not intended to be duplicative of prior Information Requests, but rather supplements the earlier Information Requests and seeks additional information. Compliance with Information Requests under Section 104(e) of CERCLA is mandatory. Failure to respond fully and truthfully within sixty (60) days after receipt of this letter, or to justify adequately any failure to respond, can result in enforcement action pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5).

This Information Request is directed to you, your company, its officers, directors and employees, and its subsidiaries, divisions, facilities and their officers, directors and employees. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 *et seq.*

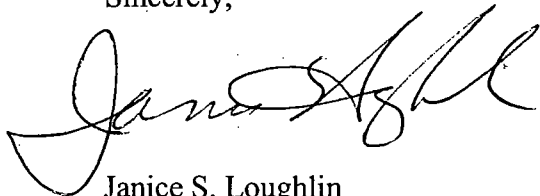
Please mail your response within sixty (60) days after your receipt of this Information Request to:

Ms. Eileen L. Furey  
Associate Regional Counsel (C-14J)  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3507

Please direct any questions you may have regarding this Information Request to Ms. Furey at (312) 886-7950, or Ms. Renita Ford, U.S. Department of Justice at (202) 305-0232.

Thank you for your cooperation in this matter.

Sincerely,



Janice S. Loughlin  
Section Chief, Multi-Media Branch II  
U.S. EPA Region 5

Attachment

cc: E. Furey (EPA)  
M. Adams (EPA)  
S. Kolak (EPA)  
R. Ford (U.S. DOJ)  
N. Gordon (MI Attorney General)  
Mary-Lynn Taylor (DOI)

## **Attachment A**

### **Kalamazoo River Area Secondary Fiber Paper Mills (Ownership as of 1971 to 1985 and former owners 1954 to 1971)**

1. American Fibrit, Inc.  
76 Armstrong Road  
Battle Creek, MI 49015
  
2. St Regis Corporation  
Recycled Fiber Division  
Battle Creek Paperboard Mills  
79 East Fountain Street  
Battle Creek, MI 49017  
  
a/k/a: St. Regis Company  
Battle Creek Paperboard Mills  
  
Michigan Carton Company  
Mill No. 1  
  
Michigan Paperboard Corp.
  
3. St Regis Corporation  
Recycled Fiber Division  
Battle Creek Paperboard Mills  
177 Angell Street  
Battle Creek, MI 49015  
  
a/k/a: St. Regis Company  
Battle Creek Paperboard Mills  
  
Michigan Carton Company  
Mill No. 2  
  
Rock-Tenn Company

4. Georgia-Pacific Corporation  
2425 King Highway  
Kalamazoo, MI 49001

a/k/a: Kalamazoo Paper Company

5. Hawthorne Paper Company, Inc.  
subsidiary, Gould Paper Corporation  
King Highway  
Kalamazoo, MI 49003

a/k/a: Hawthorne Paper Company

Gould Paper Corporation

6. Millennium Holdings, Inc.  
subsidiary, SCM Corporation  
Paper Mills Division  
2030 Portage Street  
Kalamazoo, MI 49001

a/k/a: Allied Paper Corporation  
King Mill  
Monarch Mill  
Bryant Mill

Allied Paper Mills

7. Georgia-Pacific Corporation  
Paper Packaging Group  
243 East Patterson Street  
Kalamazoo, MI 49007

a/k/a: James River Corporation

Brown Company  
Pulp, Paper and Board Manufacturing Division

KVP Southerland Paper Company

Kalamazoo Vegetable Parchment Company  
Southerland Division

Southerland Paper Company

8. Minnesota Mining & Manufacturing Company  
Paper Products Division  
Kalamazoo, MI 49003

9. National Gypsum Company  
2305 East King Highway  
Kalamazoo, MI 49001

10. Rex Paper Company  
King Highway  
Kalamazoo, MI

11. Mead Corporation  
Paperboard Products Division  
431 Helen Street  
Otsego, MI 49078

a/k/a: Hoerner-Waldorf Corporation  
Mac Sim Bar Mill

Mac Sim Bar  
div., Waldorf paper Products Company

Mac Sim Bar Paper Products Company

Mac Sim Bar Paper Company  
div., United Biscuit Company of America

12. Menasha Corporation  
Paperboard Division  
320 North Farmer Street  
Otsego, MI 49078

a/k/a: Otsego Falls Paper Mills  
div., Menasha Wooden Ware Corporation

Otsego Falls Paper Mills, Inc.

13. Georgia Pacific Corporation  
KVP Group  
Parchment and Paper Divisions  
100 Island Avenue  
Parchment, MI 49004

a/k/a: James River Corporation

Brown Company  
Specialty papers Division

Brown Company  
Paper Division

KVP Southerland Paper Company

Kalamazoo Vegetable Parchment Company



14. Simpson Plainwell Paper Company  
200 Allegan Street  
Plainwell, MI 49080

a/k/a: Plainwell Paper Company  
affl: Philip Morris Industrial Inc.

Plainwell Paper Company  
div., Nicolet Paper Company

Weyerhaeuser Company  
Plainwell Division

Hamilton Paper Company  
sub., Weyerhaeuser Company

Michigan Paper Company of Plainwell  
wholly-owned sub., W.C. Hamilton & Sons

15. Crown Vantage, Inc.  
Parchment, Michigan